

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MENG HUANG,

Plaintiff,

v.

THE OHIO STATE UNIVERSITY and GIORGIO  
RIZZONI,

Defendants.

Case No: 2:19-cv-1976

Judge James L. Graham

Magistrate Judge: Chelsey M. Vascura

**JOINT MOTION OF PARTIES TO CONTINUE  
FINAL PRETRIAL AND TRIAL**

NOW COME the Parties, by and through counsel, and request this Honorable Court to continue until 2023 the final pretrial and trial dates for this matter. As the Court is aware, Plaintiff's prior trial counsel, who was counsel of record on this matter for close to 3 years, filed a motion to withdraw earlier this year. Plaintiff had a difficult time locating alternate counsel and current trial counsel for Plaintiff did not appear in the case until May 2022. The Court vacated the prior pretrial and trial dates on this matter while Plaintiff located new counsel.

By Order of this Court dated June 17, 2022, the Court reset the pretrial and trial dates for this matter for October 7 and November 7, 2022, respectively. There is also a fully-briefed motion for summary judgment pending with the Court.

Plaintiff's new trial counsel is currently scheduled to commence a jury trial in the Summit County Court of Common Pleas on October 17, 2022 on the case of *Rachel Bell v. University of Akron*, case no CV-2018-10-4103. That matter was set for trial before this matter - on June 7, 2022. The *Bell* matter involves 12 plaintiffs and counsel anticipates it will take up to 3 weeks to try, which will result in a conflict with the November 7, 2022 trial date in this case. In addition, attorney Joseph Coburn, who was assisting Plaintiff's counsel on this matter, has resigned from Plaintiff's counsel's firm, making trial preparation in this matter even more difficult.

In addition, Defendant Dr. Rizzoni was recently assigned by the University to a large research project to be completed by years' end which could conflict with trial proceedings.

Last, the parties informally agreed in 2020 to postpone *damages* expert identification and discovery until after a decision on summary judgment in order to save time and expense in the event the case did not proceed past the summary judgment stage. With the final pretrial conference in only a few weeks and the trial date 30 days thereafter, the parties are concerned about their ability to complete the damages expert discovery in time to prepare for trial.

As a result, the Parties request that this Court continue until 2023 the final pretrial and trial dates in this matter.

Respectfully submitted,

**Ohio Attorney General**

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